

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

Andrew Aaron, et al.,

Plaintiffs,

v.

Case No. 20-CV-1660

Dominick Ratkowski and Joseph Roy,

Defendants.

**PARTIES' PROPOSED STIPULATIONS
FOR INCLUSION IN JURY INSTRUCTIONS**

The plaintiff and the defendants have stipulated -- that is, they have agreed -- that the following facts are true.

1. On or around June 5, 2020, Dominick Ratkowski, a civilian crime analyst hired by the City of Wauwatosa created a list.
2. On January 7, 2021, Joseph Roy released unredacted documents by providing a dropbox link to documents which included Wauwatosa Police Department police reports, citations, squad and body camera video as well as videos and reports produced from other agencies.
3. Defendant Ratkowski did not get consent from any Plaintiff to obtain, use, or disclose their personal information from their motor vehicle records.
4. Defendant Ratkowski knowingly obtained, used, or disclosed 44 Plaintiffs' personal information.
5. All of the Plaintiffs' photos on the left side of the list are drivers' license photographs.
6. The drivers' license photographs on the list are from motor vehicle records.
7. DOT means Department of Transportation.

Authority, Committee's Comments:

When parties enter into stipulations as to material facts, those facts will be deemed to have been conclusively proved, and the jury may be so instructed. *United States v. Houston*, 547 F.2d 104, 107 (9th Cir. 1976).